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VALENT U.S.A. CORPORATION AND
SUMITOMO CHEMICAL CO. LTD.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

VALENT U.S.A. CORPORATION AND
SUMITOMO CHEMICAL CO. LTD.

Plaintiffs,

v.

SYNGENTA CROP PROTECTION, INC.

Defendant.

Case No. CV 08 0720 VRW

**ADMINISTRATIVE MOTION OF
VALENT U.S.A. CORPORATION AND
SUMITOMO CHEMICAL CO. LTD. TO
FILE THE JOINT MOTION FOR TWO-
MONTH STAY OF THE CURRENT
JURISDICTIONAL DISCOVERY
SCHEDULE PURSUANT TO L.R. 7-11
UNDER SEAL**

**SUPPORTING DECLARATION OF
SALVATORE P. TAMBURO**

[PROPOSED ORDER]

**ADMINISTRATIVE MOTION FOR FILING JOINT MOTION FOR TWO MONTH STAY OF
THE CURRENT JURISDICTIONAL DISCOVERY PROCEDURAL SCHEDULE
PURSUANT TO L.R. 7-11 UNDER SEAL**

1. Papers Submitted for Filing Under Seal in Their Entireties

Pursuant to Civil Local Rules 7-11 and 79-5(b) and (d), Plaintiffs Valent U.S.A. Corporation and Sumitomo Chemical Co. Ltd. hereby request leave of Court to file under seal in its entirety the following document being lodged with the Clerk:

1 a. Joint Motion for Two-Month Stay of the Current Jurisdictional Discovery
2 Schedule Pursuant to L.R. 7-11. This Joint Motion contains sensitive business information.
3 Accordingly, the Joint Motion should be filed under seal from public view.

4 As required by Civil Local Rule 79-5(b) and (d), Plaintiff is lodging with the
5 Clerk a copy of this Joint Motion for Two-Month Stay of the Current Jurisdictional Discovery
6 Schedule.

SUPPORTING DECLARATION OF SALVATORE P. TAMBURIO

I, Salvatore P. Tamburo, declare as follows:

1. I am an attorney licensed to practice law before all courts of the State of New York and the District of Columbia and am admitted *pro hac vice* to practice before this Court, and am a Partner with Dickstein Shapiro LLP, counsel for Plaintiffs in the above-entitled action. I submit this declaration in support of the Administrative Motion of Valent U.S.A. Corporation and Sumitomo Chemical Co. Ltd. to File Joint Motion for Two-Month Stay of the Current Jurisdictional Discovery Schedule Under Seal. The matters stated herein are based upon my personal knowledge, and if called as a witness to testify, I could and would competently do so.

2. The representations made above in this Administrative Motion are true and correct to the best of my knowledge and belief.

3. Counsel for Defendant has stipulated to filing the Joint Motion for Two-Month Stay of the Current Jurisdictional Discovery Schedule under seal.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct and this declaration was executed this 1st day of August, 2008, at Washington, District of Columbia.

Dated: August 1, 2008

By /s/Salvatore P. Tamburo
Salvatore P. Tamburo

[PROPOSED] ORDER

Upon good cause shown, IT IS HEREBY ORDERED that the following documents be filed under seal:

1. The August 1, 2008 Joint Motion for Two-Month Stay of the Current Jurisdictional Discovery Schedule Pursuant to L.R. 7-11.

IT IS SO ORDERED.

Dated: August __, 2008

Chief Judge Vaughn R. Walker